

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR,
Plaintiff,

v.

CRAIG S. DONAIS;
RUSSELL F. HILLIARD;
DONAIS LAW OFFICES, PLLC;
UPTON & HATFIELD, LLP;
and MARY K. DONAIS,
Defendants.

Case No.1:23-cv-00374-JL

**EMERGENCY/EXPEDITED
MOTION TO EXTEND TIME TO FILE OBJECTION TO THE MOTION TO DISMISS
FILED BY THE DONAIS DEFENDANTS**

1. NOW COMES the Plaintiff and respectfully requests this Court extend by 45 days the time to file an objection to the motion to dismiss filed by Craig Donais, Mary Donais and Donais Law Offices (“the Donais defendants”). NB: The other defendants have not filed a motion to dismiss.
2. As grounds therefor, the Plaintiff states the following.

I. BACKGROUND

3. On 7/28/23, the court issued a procedural order for a 30 day deadline to refile motions previously filed in the MA federal court. This deadline fell on Monday 8/28/23.
4. On 8/23/23, a joint motion was filed by the Defendants on behalf of the parties.
5. On 8/23/23, the court granted the extension until 9/27/23.
6. Subsequently, the plaintiff sought an extension until 10/27/23 to refile motions from the MA federal court.
7. The court granted the extension until 10/27/23.
8. However, on 9/26/23, the Donais defendants filed a motion to dismiss, which was after the court granted the extension request, and after the plaintiff indicated that he could not respond to any motion to dismiss within 14 days of the filing of such motion.
9. Pursuant to the applicable rule, the plaintiff understands that he has 14 days to file an objection, which would normally fall on or about October 10, 2023 (due to the long holiday weekend).

II. GROUND

A. First Ground

10. As mentioned in the prior motion, the plaintiff has a family emergency that required him to travel (long distance) on short notice concerning an elderly ailing parent, which has affected his time and availability, and has impacted his ability to meet the 14 day timeline to file an objection.
11. Therefore, the plaintiff needs an extension of 45 days until November 25, 2023.
12. This request is implied within the prior motion since this point and need for extension to file an objection was explicitly referenced in the prior motion.

B. Second Ground

13. The plaintiff is not available to respond within 14 days to the motion filed by the Donais defendants.
14. The plaintiff stated this point in his prior motion, which was granted by the court. It is therefore implied that the court understood this point and that it would implicitly grant a similar extension. In the abundance of being conservative and for clarity purposes, the plaintiff now files this motion to request an extension to object to the motion to dismiss filed by the Donais defendants.
15. Therefore, it serves judicial economy and the proper administration of justice to allow an extension under the circumstances.

C. Third Ground

16. Furthermore, the plaintiff ordered a transcript of the hearing in MA federal court.
17. The plaintiff needs the transcript for opposing the defendants' motion to dismiss.
18. Although a transcript of the hearing has been prepared, the transcript needs to be corrected.
19. Additional time is needed to allow for the transcript correction process.

D. Fourth Ground

20. It is in the interest of justice and equity that the extension be allowed

III. CONCLUSION

21. This request is not intended to delay or prejudice the Court or any party.
22. The plaintiff is in the midst of travel and could only quickly draft this motion in 10 minutes and file it, while in the midst of travel. Plaintiff did not have time or opportunity to reach out to the defendants for assent.
23. Given that time is of the essence, the plaintiff asks that the court issue an expedited order so that the plaintiff can know how to proceed in advance of the deadline today, if possible.
24. This is a reasonable request under the circumstances.
25. In the alternative, if the court prefers, the plaintiff would settle for any extension of time, if that better pleases the court. This is preferable rather than an outright denial of the motion.

26. WHEREFORE, the Plaintiff respectfully request that this Court grants the motion to extend time or any other relief the Court deems proper. Please grant a pro se liberal construction to this request.

Respectfully submitted,

/s/ Andre Bisasor

Andre Bisasor

679 Washington Street, Suite # 8-206

Attleboro, MA 02703

T: 781-492-5675

Email: quickquantum@aol.com

October 10, 2023

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor

Andre Bisasor

679 Washington Street, Suite # 8-206

Attleboro, MA 02703

T: 781-492-5675

Email: quickquantum@aol.com